

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

September 22, 2008

JK

TO: Internal File

THRU: Daron R. Haddock, Permit Supervisor DRH

FROM: James D. Smith, Environmental Scientist III JS 09/24/08

RE: Bath House Parking Lot Expansion, Hiawatha Coal Company, Bear Canyon Mine, C/015/0025, Task ID # 3016

SUMMARY:

Hiawatha Coal Company proposes to expand the Bear Canyon Mine parking area to create adequate parking space for their current work force. Additionally, the roadway into the mine needs to be widened to allow safe two-way travel for large trucks.

Due to the proximity of Bear Creek, the Permittee is proposing to avoid impinging on the stream by expanding the parking lot to the west and south. This will be an IBC along the west permit area boundary at the Bath House Area.

MSHA has pressed the Permittee to install a guard rail on the southwest side of Pond B and to widen the road to accommodate two-lane truck traffic through that area. Also, because the Bath House Parking lot cannot accommodate all of the miner's vehicles, the road is being used for parking. Hiawatha Coal Company has already eliminated the water bar at D-8D and installed culvert C-14D, which has allowed them to widen and pave this section of the road and design and order the guard rail. Because MSHA was pressing the widening of the road as a safety issue, the Division confirmed the culvert sizing calculations and approved installation of culvert C-14D prior to a full review of this amendment. Approval was based on the recommendation of Pete Hess, the Division's inspector, who was familiar with the on-site conditions, and a review of the culvert-sizing calculations by Jim Smith.

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TECHNICAL ANALYSIS:

GENERAL CONTENTS

PERMIT APPLICATION FORMAT AND CONTENTS

Regulatory Reference: 30 CFR 777.11; R645-301-120.

Analysis:

The C2 form indicates Plate 2-2B was part of the submittal, but that plate was not in either the hard copy or the electronic version on the CDs. Shawn Baker has indicated to Steve Christensen that the C2 form is incorrect and Plate 2-2B is not part of this submittal.

Findings:

R645-301-120: The Permittee needs to correct the C2 form for the next submittal.

ENVIRONMENTAL RESOURCE INFORMATION

GEOLOGIC RESOURCE INFORMATION

Regulatory Reference: 30 CFR 784.22; R645-301-623, -301-724.

Analysis:

Geologic information currently in the MRP describes the geology of the proposed Bathhouse Parking lot expansion and adjacent area: no new information has been provided. Geologic Information is sufficient to determine the PHC, that reclamation can be accomplished and that the proposed operation has been designed to prevent material damage to the hydrologic balance outside the permit area. The expansion will not involve affect the subsidence control plan or involve potentially acid- and toxic-forming strata.

The Division has determined that no additional geologic information is necessary to protect the hydrologic balance, to minimize or prevent subsidence, or to meet the performance standards.

Findings:

Geologic Resource Information for the Bathhouse Parking lot expansion and adjacent area is in the current MRP and meets the requirements of the Utah Coal Mining Rules.

CUMULATIVE HYDROLOGIC IMPACT ASSESSMENT

Regulatory Reference: 30 CFR Sec. 784.14; R645-301-729.

Analysis:

This minor amendment does not necessitate an update to the CHIA. The March 30, 2007 Gentry Mountain CHIA meets the requirements of R645-301-729.

Findings:

The current Gentry Mountain CHIA meets the requirements of R645-301-729.

RECOMMENDATIONS:

No new geologic information was submitted. Based on geologic information in the current MRP, this amendment can be approved